

1		Honorable Thomas S. Zilly	
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6	IN THE UNITED STATES DI	STRICT COLIRT EOR THE	
7	IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON SEATTLE DIVISION		
8	SEATTLE L	NV ISION	
9	UNITED STATES OF AMERICA,	Case No. 2:16-cv-1041-TSZ	
10	Plaintiff,	Case No. 2.10-ev-1041-132	
11	v.)	REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANTS	
12	DAVID A. GOULD; JANE C. POLINDER;) BROOKLINE PROPERTIES, INC.;)	TARIO AND ASSOCIATES, P.S., AND WASHINGTON STATE	
13	WHATCOM COUNTY TREASURER; TARIO AND ASSOCIATES, P.S.;	DEPARTMENT OF SOCIAL AND HEALTH SERVICES	
14	WASHINGTON STATE DEPARTMENT OF) SOCIAL AND HEALTH SERVICES;	Note on Motions Calendar:	
15	FINANCIAL CONCEPTS, LTD.;) GOLDSTAR ENTERPRISES, INC.,)	October 17, 2016	
16	Defendants.		
17	<u> </u>		
18	In accordance with Fed. R. Civ. P. 55(a) and LCR 55(a), the United States of America,		
19	through undersigned counsel, requests that the Clerk of the Court enter default against Defendant		
20	Tario and Associates, P.S., and against Defendant Washington State Department of Social and		
21	Health Services for failing to plead or otherwise defend. The attached Declaration of Charles J.		
22	Butler states the basis for this request.		
23	REQUEST FOR ENTRY OF DEFAULT 1	H.C. DEBARTMENT OF HISTOR	
	Case No. 2:16-cv-1041-TSZ	U.S. DEPARTMENT OF JUSTICE Tax Division, Western Region P.O. Box 683 Washington, D.C. 20044	

Washington, D.C. 20044 Telephone: 202-514-6062

1	Dated: October 17, 2016	Respectfully submitted,
2		CAROLINE D. CIRAOLO
3		Principal Deputy Assistant Attorney General
4		/s/ Charles J. Butler CHARLES J. BUTLER
5		Trial Attorney, Tax Division U.S. Department of Justice
6		P.O. Box 683
7		Washington, D.C. 20044 202-514-6062 (v)
8		202-307-0054 (f) Charles.J.Butler@usdoj.gov
9		Of Counsel:
10		ANNETTE L. HAYES United States Attorney
		Western District of Washington
11		Attorneys for the United States of America
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1 **CERTIFICATE OF SERVICE** 2 I hereby certify that on October 17, 2016, I filed the foregoing with the Clerk of Court 3 using the CM/ECF system, which will provide electronic notice to counsel of record for all 4 parties that have appeared in this action. In addition, the foregoing was served on the following 5 parties by U.S. mail: Whatcom County Prosecuting Attorney 6 311 Grand Avenue 7 Suite 201 Bellingham, WA 98225 8 Counsel for Washington State Department of Social and Health Services 9 Tario and Associates, P.S. 10 119 N. Commercial St. #1000 11 Bellingham, WA 98225 12 13 14 s/ Charles J. Butler 15 CHARLES J. BUTLER Trial Attorney, Tax Division 16 U.S. Department of Justice 17 18 19 20 21 22 23 REQUEST FOR ENTRY OF DEFAULT U.S. DEPARTMENT OF JUSTICE 3

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